

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

MATTHEW LAMPI,

Defendant.

CR. NO. 4:23-CR-00162

(Chief Judge Brann)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 371
(Conspiracy)

FILED
SCRANTON

JUN 13 2023

PER JKC
DEPUTY CLERK

I. Background

At times material to the Indictment:

A. Relevant Individuals and Entities

1. MATTHEW LAMPI resided in East Bethel, Minnesota.

2. Jeremy Pauley resided in Enola, Pennsylvania, and

Bloomsburg, Pennsylvania, both within the Middle District of
Pennsylvania.

3. The University of Arkansas for Medical Sciences (UAMS)
was both a hospital and a health sciences university located in Little
Rock, Arkansas.

4. PayPal was an American financial technology company headquartered in San Jose, California. PayPal's services allow users to transfer money electronically.

5. Business 1 was a Class B, C, and D mortuary located in Little Rock, Arkansas, and offered transportation, embalming, and cremation services to commercial entities, including hospitals and funeral homes.

6. Candace Chapman Scott was a resident of Little Rock, Arkansas.

7. Scott was employed at Business 1, and her job duties included transportation, cremation, and embalming of human remains.

B. UAMS Anatomical Gift Program Operations

8. UAMS's College of Medicine had an anatomy lab that received cadavers through the Anatomical Gift Program. Through that program, donors could gift their body after death to UAMS's Department of Neurobiology and Developmental Sciences to be used specifically for medical education, teaching, and research.

9. After use, donated cadavers were to be cremated and then

returned to UAMS for final disposition.

10. At all times, donated cadavers were the sole property of UAMS.

11. In 2014, UAMS contracted with Business 1 for cremation services.

12. The cremation services specifications, in part, required Business 1 “to provide individual containers for human remains, remove 2-4 containers from the UAMS campus per trip[,] transport remains to crematory, provide cremation and return cremains in suitable, identifiable, individual containers to UAMS within 72 hours from date of cremation.”

13. The term “cremains” means the ashes of a cremated human body.

14. Business 2 is a funeral home located in Little Rock, Arkansas, that provides funeral and burial services. Business 2 used the cremation services of Business 1.

15. Employees of Business 1 were not permitted to remove, keep, or sell any human remains, in whole or in part, belonging to a

donated cadaver.

II. The Conspiracy and its Objects

16. From in or about 2018, the exact date being unknown to the Grand Jury, and continuing thereafter until in or about August 2022, in the Middle District of Pennsylvania, and elsewhere, the defendant,

MATTHEW LAMPI,

knowingly, intentionally and willfully conspired, combined, confederated, and agreed with Jeremy Pauley, Candace Chapman Scott, and other persons both known and unknown to the Grand Jury, to unlawfully transport, transmit, and transfer, and cause to be transported, transmitted, and transferred in interstate commerce from the Middle District of Pennsylvania to the State of Minnesota, stolen goods, wares and merchandise, that is, human remains, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud, in violation of Title 18, United States Code, Section 2314.

17. The object of the conspiracy was to profit from the interstate shipment, purchase, and sale of stolen human remains.

III. Manner and Means

The object of the conspiracy was accomplished, in part, by the following manner and means:

18. Candace Chapman Scott stole human remains from Business 1 in Little Rock, Arkansas, without the knowledge or permission of Business 1 or any client of Business 1, including UAMS and Business 2, and sold and shipped them to Jeremy Pauley in the Middle District of Pennsylvania.

19. Stolen human remains sold and shipped in interstate commerce by the co-conspirators included bones, skulls, skin, dissected faces and heads, internal organs (often referred to by various co-conspirators as “wets” or “wet specimens”), including brains, lungs, and others, and whole stillborn corpses.

20. Jeremy Pauley sold and shipped stolen human remains he had purchased from Candace Chapman Scott to buyers in various states, including MATTHEW LAMPI in Minnesota.

21. At times, MATTHEW LAMPI sold human remains to Jeremy Pauley or sent human remains to Jeremy Pauley in trade for other human remains.

IV. Overt Acts

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Middle District of Pennsylvania and elsewhere:

22. On or about October 28, 2021, UAMS transferred three cadavers donated through the Anatomical Gift Program to Business 1 for cremation. After cremation, the cremains were to be returned in whole to UAMS.

23. On or about October 28, 2021, Scott sent Jeremy Pauley a message through Facebook stating “I follow your page and work and LOVE it. I’m a mortician and work at a trade service mortuary, so we are contracted through the medical hospital here in Little Rock to cremate their cadavers when the medical students are done with them before they discard them in a cremation garden. Just out of curiosity, would you know anyone in the market for a fully in tact [sic], embalmed

brain?”

24. On or about October 28, 2021, Scott sent Jeremy Pauley a message through Facebook stating, “I actually just looked and I have 2 embalmed with skull cap.” Jeremy Pauley instructed Scott how to package the parts.

25. Between on or about October 28, 2021, and December 2021, Candace Chapman Scott sold Jeremy Pauley stolen human remains on multiple occasions and shipped the remains from Little Rock, Arkansas to Enola, Pennsylvania. Jeremy Pauley paid Chapman Scott for the remains through PayPal.

26. Between on or about December 2, 2021, through December 7, 2021, UAMS transferred 12 cadavers donated through the Anatomical Gift Program to Business 1 for cremation. After cremation, the cremains were to be transported in whole back to UAMS.

27. On or about December 6, 2021, Scott and Jeremy Pauley negotiated a sale of “2 brains, one with skullcap, 3 hearts one cut, 2 fake boobies, one large belly button piece of skin, one arm, one huge piece of skin, and one lung.” Scott took photos of each body part inside her

apartment and sent the photos through Facebook to Jeremy Pauley. Scott agreed to sell the body parts to Jeremy Pauley for \$1,600.

28. On or about December 6, 2021, Jeremy Pauley paid Scott \$1,600.00 through PayPal.

29. On or about December 7, 2021, Jeremy Pauley paid Scott \$300.00 through PayPal.

30. On or about December 7, 2021, Jeremy Pauley notified MATTHEW LAMPI that he had hearts and brains coming. Jeremy Pauley sent MATTHEW LAMPI photographs that Candace Chapman Scott had sent PAULEY depicting Chapman Scott displaying human remains in her apartment. MATTHEW LAMPI agreed to purchase three items for \$4,000. Jeremy Pauley stated, "Deal! Soon as it all gets here I'll wrap it up and send it out!"

31. On or about December 8, 2021, UAMS transferred four cadavers donated through the Anatomical Gift Program to Business 1 for cremation. After cremation, the cremains were to be returned in whole to UAMS.

32. On or about December 8, 2021, Scott and Jeremy Pauley

negotiated a sale of “7 huge pieces of skin, 2 large pieces of skin with tiddy, 4 brains one with skull cap, 1 lung, one penis, 2 testicles, and 3 hearts,” with an agreed upon price of \$2,000.00.

33. On or about December 8, 2021, Jeremy Pauley paid Scott \$500 through PayPal.

34. On or about December 8, 2021, Jeremy Pauley sent MATTHEW LAMPI a photograph of human remains and told Lampi it included “Four more brains, three hearts, a perfect ling [sic], penis, and a set of testicles.” Pauley sent another message with a correction, “*lung.”

35. On or about December 10, 2021, Scott took pictures of nine boxes packaged for mailing in her apartment and sent the photos to Jeremy Pauley through Facebook Messenger.

36. On or about December 10, 2021, Scott shipped four boxes containing human remains from Arkansas through USPS to Jeremy Pauley in Enola, Pennsylvania.

37. On or about December 12, 2021, MATTHEW LAMPI asked Jeremy Pauley for an “update on parts?” Jeremy Pauley responded

“Some say Monday delivery, some say Thursday delivery. IF things show up on time with how the mail has been lol!”

38. On or about December 13, 2021, Scott shipped five boxes containing human remains from Arkansas through USPS to Jeremy Pauley in Enola, Pennsylvania.

39. On or about December 13, 2021, Jeremy Pauley paid Scott \$175.00 through PayPal for shipping the remains.

40. On or about December 14, 2021, Jeremy Pauley notified MATTHEW LAMPI that he was “Going to pack up your brain and heart tonight, arm isn’t here yet but I’ll send it out soon as it arrives!” Jeremy Pauley sent MATTHEW LAMPI a photograph of a USPS barcode with tracking number and the message, “All set to head out tomorrow!” MATTHEW LAMPI responded, “Nice! Parts correct?” “Brain and heart you! Will send arm soon as the rest of the packages arrive.”

41. On or about December 14, 2021, Scott informed Jeremy Pauley through Facebook Messenger that she had “2 fully intact brains” and agreed to sell them to him for \$250.00.

42. On or about December 14, 2021, Scott informed Jeremy Pauley through Facebook Messenger that she had “2 hearts, 1 brain w/skullcap,” and agreed to sell them to him for \$350.00.

43. On or about December 14, 2021, Jeremy Pauley paid Scott \$350.00 through PayPal.

44. On or about December 15, 2021, Jeremy Pauley paid Scott \$250.00 and \$1,500.00 through PayPal.

45. On or about December 15, 2021, Scott shipped one box containing human remains through USPS from Arkansas to Jeremy Pauley in Enola, Pennsylvania.

46. On or about December 15, 2021, Scott asked Jeremy Pauley through Facebook Messenger if he would be interested in purchasing a fetus. Jeremy Pauley instructed Scott how to package a fetus.

47. On or about December 16, 2021, Jeremy Pauley paid Scott \$350.00 and \$1,100.00 through PayPal.

48. On or about December 31, 2021, Scott shipped Jeremy Pauley one box containing human remains through USPS from Arkansas to Jeremy Pauley in Enola, Pennsylvania.

49. In or about February 2022, D.S., an Arkansas resident, gave birth to a stillborn baby boy, whom she named Lux. On or about February 5, 2022, Business 2 was authorized to dispose of Lux's remains by means of cremation. On or about February 9, 2022, Business 2 transferred Lux's body to Business 1 for cremation. After cremation, the fetal cremains were to be returned in whole to Business 2 so they could be turned over to D.S.

50. On or about February 9, 2022, Candace Chapman Scott stole Lux's remains, without the knowledge or permission of Business 1, Business 2, nor D.S., and agreed to sell his remains to Jeremy Pauley in exchange for \$300. Scott took photos of Lux's remains and sent the photos to Jeremy Pauley through Facebook Messenger. Jeremy Pauley paid Scott \$300 through PayPal.

51. On or about February 10, 2022, a burial-transit/cremation permit record was signed by a representative of Business 1, asserting the fetal remains it received from Business 2 had been cremated. D.S. was later provided with cremains of unknown origin, purported to be the cremains of her son, Lux.

52. On or about February 16, 2022, Chapman-Scott shipped Lux's remains to Jeremy Pauley in Enola, Pennsylvania.

53. On or about February 27, 2022, Jeremy Pauley agreed to trade Lux's remains to MATTHEW LAMPI, along with \$1,550, in exchange for five human skulls.

54. On or about February 28, 2022, Jeremy Pauley shipped a package bearing tracking number ending 0123 26 from Enola Pennsylvania to MATTHEW LAMPI's residence in East Bethel, Minnesota.

55. On or about April 17, 2022, MATTHEW LAMPI sent Jeremy Pauley a text message through the internet application WhatsApp, stating, "when are wets next month?" Jeremy Pauley replied "Not sure on exact date. She just lets me know when they start cremating the medical cadavers from the semester and packs up boxes for me. But it's always a shit ton[.]" MATTHEW LAMPI responded, "Cool I want faces as we spoke about other stuff too[.]"

56. On or about May 9, 2022, UAMS transferred one cadaver donated through the Anatomical Gift Program to BUSINESS 1 for

cremation. After cremation, the cremains were to be returned in whole to UAMS.

57. On or about May 11, 2022, Scott informed Jeremy Pauley through Facebook Messenger that she received a liver and a heart “cut in half.”

58. On or about May 13, 2022, Scott informed Jeremy Pauley through Facebook Messenger that she received a “1/2 a brain, 2 smokers lungs, one lower chunk of pubic skin with peen and sack attached, 2 larger pieces of skin, one small piece with nip,” and agreed to sell them to Jeremy Pauley for \$850.00.

59. On or about May 13, 2022, Jeremy Pauley paid Scott \$850.00 through PayPal.

60. On or about May 27, 2022, Jeremy Pauley notified MATTHEW LAMPI he had a pair of smoker’s lungs for sale.

61. On June 10, 2022, MATTHEW LAMPI asked for a picture of the smoker’s lungs, and Jeremy Pauley sent him two photographs. They agreed on a price of \$1,900 to be paid through PayPal, and Jeremy Pauley sent MATTHEW LAMPI a photograph of a USPS barcode on a

package with tracking number.

62. On or about May 26, 2022, UAMS transferred one cadaver donated through the Anatomical Gift Program to BUSINESS 1 for cremation. After cremation, the cremains were to be returned in whole to UAMS.

63. On or about May 28, 2022, Scott informed Jeremy Pauley through Facebook Messenger that she had obtained a “kidney, lung, heart, trachea, small cut section of calvarium w/ hair,” and agreed to sell them to Jeremy Pauley for \$800.

64. On or about May 28, 2022, Jeremy Pauley paid Scott \$800.00 through PayPal.

65. On or about June 30, 2022, UAMS transferred seven cadavers donated through the Anatomical Gift Program to BUSINESS 1 for cremation. After cremation, the cremains were to be returned in whole to UAMS.

66. On or about June 30, 2022, Scott informed Jeremy Pauley through Facebook Messenger she had “one half head, one whole head minus skullcap, three brains with skullcap, one heart, three liver, five

lungs, two kidneys, one full pelvis female, one piece of skin with nipple, four hands.” Jeremy Pauley agreed to buy them for \$4,000.

67. On or about July 9, 2022, Scott shipped two boxes containing human remains through USPS from Arkansas to Jeremy Pauley in Thompson, Pennsylvania.

68. In June 2022, Jeremy Pauley was encountered by local police based on an anonymous tip that he was advertising human remains for sale on Facebook.

69. On or about June 20, 2022, MATTHEW LAMPI sent a message to Jeremy Pauley through WhatsApp asking, “Hello so what did the police say[?]” Jeremy Pauley responded that he had been asked about human remains, but that, “in the end the only thing that mattered was nothing was proven grave robbed or stolen out of a morgue,” followed by a smiley face emoji.

70. MATTHEW LAMPI transferred 8 payments totaling \$8,890 in United States currency via PayPal to Jeremy Pauley. Jeremy Pauley transferred 71 payments totaling \$119,198.25 in United States Currency to MATTHEW LAMPI via PayPal, including \$10,000 on

October 21, 2021, and shipped MATTHEW LAMPI at least \$15,000 in cash.

71. Fifteen packages shipped through USPS from Enola, Pennsylvania to MATTHEW LAMPI's residence in East Bethel, Minnesota between September 2021, and June 2022. After Jeremy Pauley changed residences from Enola, Pennsylvania to Bloomsburg, Pennsylvania, another package was sent through USPS from Bloomsburg, PA to MATTHEW LAMPI's residence in East Bethel, Minnesota in August 2022.

All in violation of Title 18, United States Code, Section 371.

THE GRAND JURY FURTHER CHARGES:

COUNT 2

18 U.S.C. §§ 2314, 2

(Interstate Transport of Stolen Goods, Aid and Abet)

From in or about September 2021 through in or about August 2022, within the Middle District of Pennsylvania and elsewhere, the defendant,

MATTHEW LAMPI,

did unlawfully transport, transmit, and transfer in interstate commerce, and did aid, abet, induce, and procure the transportation, transmission, and transfer of, stolen goods, wares, and merchandise, that is, human remains, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud.

In violation of Title 18, United States Code, Sections 2314 and 2.

FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461.

Upon conviction of the offenses in violation of Title 18, United States Code, Section 371, and Title 18, United States Code, Section 2314, the defendant,

MATTHEW LAMPI,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

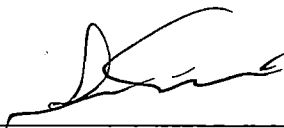
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot
be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

GERARD M. KARAM
United States Attorney



SEAN A. CAMONI
Assistant United States Attorney


FOREPERSON

6-13-2023
Date